## Exhibit 4

Hearing Date: August 16, 2013 Objection Deadline: July 29, 2013 5:00 p.m. (ET)

### **DECHERT LLP**

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Counsel to U.S. Bank National Association, as Trustee of Certain Mortgage Backed Securities Trusts

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	)	
In re:	)	
	)	Case No. 12-12020 (MG)
Residential Capital, LLC, et al.,	)	
•	)	Chapter 11
Debtors.	)	- · · · · · · · · · · · · · · · · · · ·
	_)	Jointly Administered

### THE RMBS TRUSTEES' FACT WITNESS DISCLOSURE

Pursuant to Rule 26(a)(3)(i) of the Federal Rules of Civil Procedure, as incorporated by Rule 7026 of the Federal Rules of Bankruptcy Procedure, The Bank of New

York Mellon and The Bank of New York Mellon Trust Company, N.A. (collectively "BNY Mellon"), U.S. Bank National Association ("U.S. Bank") and Wells Fargo Bank, N.A. ("Wells Fargo"), solely in their respective capacities as trustee, indenture trustee, securities administrator and/or other similar capacities or as master servicer for certain mortgage backed securities trusts (collectively, the "Trustees"), by and through their undersigned counsel, hereby make the following fact witness disclosure.

The Trustees may call the following individuals as fact witnesses to testify at trial or any hearing concerning the *Debtors' Motion Pursuant to Fed. R. Bankr. P 9019 for Approval of Settlement Agreement Among the Debtors, FGIC, the FGIC Trustees, and Certain Institutional Investors* [Docket No. 3929]:

Mamta K. Scott
Vice President
U.S. Bank National Association
c/o Mark D. Kotwick
Seward & Kissel LLP
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New York, New York 10004
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Mary L. Sohlberg Vice President Wells Fargo, N.A. c/o Michael E. Johnson Alston & Bird LLP 90 Park Avenue New York, New York 10016 Telephone: (212) 210-9400 Robert H. Major Vice President The Bank of New York Mellon Trust Company, N.A. c/o Glenn E. Siegel Dechert LLP 1095 Avenue of the Americas New York, New York 10036 Telephone: (212) 698-3500

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The Trustees reserve their right to amend, modify or supplement this disclosure, or to call any other witness designated by any other party to this proceeding, as well as their right to call other witnesses for solely for impeachment or rebuttal. The Trustees also reserve their right to designate expert witnesses.

Dated: New York, New York

July 2, 2013

### DECHERT LLP

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